UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

GREATGIGZ SOLUTIONS, LLC,

Plaintiff

Case No. 6:20-cv-651

v.

JURY TRIAL DEMANDED

LYFT, INC.

Defendant

PLAINTIFF'S UNOPPOSED MOTION TO EXTEND THE DEADLINES FOR CLAIM CONSTRUCTION BRIEFING

GreatGigz Solutions, LLC ("Plaintiff") moves the Court for an extension of the deadlines for Plaintiff to file its Opening Claim Construction Brief ("Opening Brief"), for Defendant to file its Responsive Claim Construction Brief ("Responsive Brief"), for Plaintiff to file its Reply Claim Construction Brief ("Reply Brief") and for Defendant to file its Sur-Reply Claim Construction Brief ("Sur-Reply Brief"). Plaintiff previously filed an unopposed Motion to extend deadlines for claim construction briefing, which set the deadline for Plaintiff's Opening Brief to May 24, 2021 and set the deadline for Defendant's Responsive Brief to June 14, 2021 (Dkt. 31).

The Parties are still engaged in good faith settlement discussions, and have stipulated and agreed to further extend the deadline for Plaintiff to file its Opening Brief to be up to and including May 31, 2021, to further extend the deadline for Defendant to file its Responsive Brief to be up to and including June 21, 2021, to extend the deadline for Plaintiff to file its Reply Brief to be up to and including June 28, 2021 and to extend the deadline for Defendant to file its Sur-Reply Brief to be up to and including

July 13, 2021. This motion and agreement between the Parties should not be construed as a waiver of

any other rights or defenses.

Accordingly, as stipulated and agreed by the Parties, Plaintiff respectfully requests that the

deadline for Plaintiff to file its Opening Brief be up to and including May 31, 2021, the deadline for

Defendant to file its Responsive Brief be up to and including June 21, 2021, the deadline for Plaintiff to

file its Reply Brief be up to and including June 28, 2021 and the deadline for Defendant to file its Sur-

Reply Brief be up to and including July 13, 2021.

Date: May 24, 2021

Respectfully submitted,

/s/ René A. Vazquez

René A. Vazquez

Virginia Bar No. 41988

rvazquez@ghiplaw.com

Randall T. Garteiser

Texas Bar No. 24038912

rgarteiser@ghiplaw.com

M. Scott Fuller

Texas Bar No. 24036607

sfuller@ghiplaw.com

GARTEISER HONEA, PLLC

119 W. Ferguson Street

Tyler, Texas 75702

Telephone: (903) 705-7420

Facsimile: (903) 405-3999

ATTORNEYS FOR

GREATGIGZ SOLUTIONS LLC